

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

Docket No.: 2019-208-E

South Carolina Energy Freedom Act (House Bill 3659) Proceeding Related to Duke Energy Progress, LLC and S.C. Code Ann. Section 58-41-30 Related to Electrical Utilities and Their Current Voluntary Renewable Energy Program, and Such Other Proceedings Required By the Commission

**PETITION TO INTERVENE ON
BEHALF OF CITY OF GREENVILLE**

The City of Greenville (“Greenville” or the “City,” as appropriate), in accordance with Section 103-825, South Carolina Code of Regulations, requests that the Public Service Commission of South Carolina (the “Commission”) permit it to intervene in the instant proceeding and states:

1. The Commission opened the instant docket on June 11, 2019 pursuant to provisions of the South Carolina Energy Freedom Act (the “Act”) requiring Duke Energy Progress, LLC (“DEP”) to propose a voluntary renewable energy program for the Commission’s review. *See* S.C. CODE ANN. § 58-41-30.

2. Greenville wishes to intervene in the instant proceeding because it has a direct and substantial interest in the deliberations and outcome. On April 1, 2020 the Commission granted Greenville’s petition to intervene in the electric docket opened to adjudicate DEP and Duke Energy Carolinas, LLC’s (collectively, the “Companies”) joint application to establish the ‘Green Source Advantage Program’ (the “GSA Program”). (Order No. 2020-287, Docket No. 2018-320-E, ID No. 291280.)

3. The Companies acknowledge a connection between the GSA Program and their voluntary renewable energy programs pending before the Commission.¹ The Companies reference

¹ Duke Energy Carolinas, LLC proposes its voluntary renewable energy program in a sister electric docket numbered 2019-207-E. Greenville petitioned the Commission to intervene in that proceeding contemporaneously with the instant filing.

the GSA Program in the instant proceeding and have further informed the Commission that they “believe the GSA Program . . . conforms with” the Act’s section requiring a voluntary renewable energy program. (‘Letter Responding to Commission’s June 18, 2019 Letter Regarding Voluntary Renewable Energy Programs,’ August 2, 2019, ID No. 286359.)

4. Given the overlap of the GSA Program being adjudicated in Docket No. 2018-320-E – to which Greenville is already an intervenor – and the voluntary renewable energy program being adjudicated in the instant proceeding, the City cannot adequately protect its interest in the GSA Program without intervening here.

5. Greenville acknowledges that the Commission already issued a procedural schedule, however, relies on the Commission’s policy “encouraging maximum public participation in issues before the Commission . . . [.]” even in circumstances where the petition is raised out of time. (Order No. 2005-725, Docket No. 2005-270-G, December 16, 2005.) A procedural schedule has not been issued in the GSA Program docket.

6. The City only recently discovered that the instant docket may generate rulings germane to the GSA Program and Greenville has no reason to expect its intervention will prejudice any other party or delay the proceeding.

7. On the other hand, the denial of the instant petition would impair and impede the City’s ability to provide its residents with a diverse power generation portfolio. Greenville enjoys a municipal service agreement and an operating agreement with Duke Energy Carolinas, LLC (“DEC”) to power the City’s buildings, physical plants and transportation assets and facilities. DEC provides Greenville hundreds of electric meters for service. Some City residents frequently express interest in supplying Greenville’s electricity with solar generation. The GSA Program is the only meaningful way for the City to accomplish this end.

8. Pursuant to Section 103-804(T), South Carolina Code of Regulations, Greenville is represented by the following counsel in the instant proceeding:

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TURNER, PADGET,
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The City conferred upon its counsel authority to accept service of all papers and filings for purposes of the instant proceeding.

WHEREFORE Greenville requests the Commission enter an order permitting it to intervene as a party of record and participate fully in the instant proceeding.

Respectfully submitted,

June 30, 2020)	TURNER PADGET GRAHAM & LANEY, P.A.
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)	
Greenville, South Carolina)	By: <u>/s/ R. Taylor Speer</u>
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CERTIFICATE OF SERVICE

I hereby certify on June 30, 2020 that a true and correct copy of the foregoing was served via electronic mail on the following:

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